

EXHIBIT 4

January 30, 2019 Email



Jay Marshall Wolman <jmw@randazza.com>

Re: Anglin v. Gersh | Meet and Confer

1 message

Jay M. Wolman <jmw@randazza.com>

Wed, Jan 30, 2019 at 9:47 AM

To: Beth Littrell <beth.littrell@splcenter.org>

Cc: Randazza Marc John <mjr@randazza.com>, David Dinielli <David.Dinielli@splcenter.org>, Morris Dees <morris.dees2@splcenter.org>, Richard Cohen <Richard.Cohen@splcenter.org>, Jim Knoepp <Jim.Knoepp@splcenter.org>, john <john@mswdlaw.com>, "rfolsen@mswdlaw.com" <rfolsen@mswdlaw.com>, Alex Shepard <ajs@randazza.com>, Mathew Stevenson <matstevenson@bigskylegal.com>, Tennyson Fauver <tjf@randazza.com>

Counsel,

Thank you.

Below are the revisions to the proposed stipulated protective order with which we disagree:

- a) Deletion of ¶ 2(c);
- b) Deletion of ¶ 2(e);
- c) Deletion of the last sentences of ¶¶ 5(a), (c), (d), (e), & (g);
- d) The revision in ¶ 5(f);
- e) Deletion of the sentence following ¶ 5(h);
- f) The deletions from ¶¶ 6(a) & (b);
- g) Deletion of the sentence following ¶ 6(e);
- h) Addition of "other and related proceedings" to ¶ 8 (revised numbering, which shall be used from here on, unless otherwise indicated);
- i) The deletion in ¶ 9;
- j) The deletion of the first sentence in ¶ 13;
- k) The revision in ¶ 20 from "forty-five" to "ninety";
- l) The revisions to Exhibit A.

Thank you for your attention to this matter.

Sincerely,

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel***Randazza Legal Group, PLLC**

100 Pearl Street, 14th Floor | Hartford, CT 06103

Tel: 702-420-2001 | Email: jmw@randazza.com

* Licensed to practice law in Connecticut, Massachusetts, New York and the District of Columbia.

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On Mon, Jan 28, 2019 at 5:07 PM Beth Littrell <beth.littrell@splcenter.org> wrote:

Mr. Wolman:

We look forward to speaking with you this Wednesday, at 1pm EST. We can use the following call in information: 888.450.5996; 911967#.

Thank you for alerting us to the timing concern on Friday. Someone from our team will circulate the call in information for Friday's deposition no later than cob Thursday.

Respectfully,

Beth

Beth Littrell

Senior Attorney

Southern Poverty Law Center

Atlanta Office

404-221-5876

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From: Jay M. Wolman <jmw@randazza.com>

Sent: Monday, January 28, 2019 4:19 PM

To: Beth Littrell <beth.littrell@splcenter.org>

Cc: Randazza Marc John <mjr@randazza.com>; David Dinielli <David.Dinielli@splcenter.org>; Morris Dees <morris.dees2@splcenter.org>; Richard Cohen <Richard.Cohen@splcenter.org>; Jim Knoepp <Jim.Knoepp@splcenter.org>; john <john@mswdlaw.com>; rfolsen@mswdlaw.com; Alex Shepard <ajs@randazza.com>; Mathew Stevenson <matstevenson@bigskylegal.com>; Tennyson Fauver <tjf@randazza.com>

Subject: Re: Anglin v. Gersh | Meet and Confer

Counsel,

- 1) I am available to meet and confer on either Tuesday or Wednesday, whichever is your preference;
- 2) As to the revised protective order, we are amenable to some of your revisions, but will identify the ones with which we cannot agree.
- 3) Please provide the call-in information for Friday's deposition. Please note that, since it is on a Friday, we will need it to be concluded/suspended by 4:30 p.m., Eastern, due to the Sabbath.

Thank you for your attention to this matter.

Jay Wolman

Jay Marshall Wolman, CIPP/US, Counsel*

Randazza Legal Group, PLLC

100 Pearl Street, 14th Floor | Hartford, CT 06103

Tel: 702-420-2001 | Email: jmw@randazza.com

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On Fri, Jan 25, 2019 at 4:18 PM Beth Littrell <beth.littrell@splcenter.org> wrote:

Mr. Randazza:

We received your recent letter seeking an opportunity to meet and confer about alleged deficiencies in our discovery responses. Given other obligations, travel and the upcoming deposition schedule, we have the following availability over the next 2 weeks to meet and confer:

- Tuesday, 1/29: 2-3 and 4- 5 EST
- Wednesday, 1/30, 1-2 EST and 4-5 EST
- Tuesday, 2/5, 12-1 EST
- Friday, 2/8, 1-2 EST

Further, attached please find a motion to enter a protective order and a document comparing this document with your edits. We have given your suggested edits due consideration and propose the attached as compromise. Please let us know whether you will oppose this motion and/or whether you would like to enter it as a stipulated order.

With regard to Mr. Anglin's deposition and the proposed agreement, we would need an assurance that the deposition would be conducted within the U.S. in a forum convenient to counsel. If so, subject to the language in the proposed protective order, we are inclined to accept this arrangement.

We look forward to hearing from you on these matters.

Respectfully,

Beth Littrell

Senior Attorney

Southern Poverty Law Center

Atlanta Office

404-221-5876

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From: Randazza Marc John <mjr@randazza.com>

Sent: Friday, January 25, 2019 2:25 PM

To: David Dinielli <David.Dinielli@splcenter.org>

Cc: Beth Littrell <beth.littrell@splcenter.org>; Morris Dees <morris.dees2@splcenter.org>; Richard Cohen <Richard.Cohen@splcenter.org>; Jim Knoepp <Jim.Knoepp@splcenter.org>; john <john@mswdlaw.com>; rfolsen@mswdlaw.com; Wolman Jay Marshall <jmw@randazza.com>; Alex Shepard <ajs@randazza.com>; Mathew Stevenson <matstevenson@bigskylegal.com>; Tennyson Fauver <tjf@randazza.com>

Subject: Re: Anglin v. Gersh | Meet and Confer

David, et. al.,

Would you like to speak about our correspondence today? If you believe that we can not come to a compromise on any of it, I can respect that. But, please let us know that.

We intend to file a motion to compel next week, unless we have made some progress on these items.

Further, do you have a position with respect to our client's deposition? The request from us is that you agree to a protective order. That PO would require all parties and counsel to keep the location of the deposition confidential until 7 days after the deposition has concluded.

Marc John Randazza, JD, MAMC, LLM* | Randazza Legal Group

Tel: 702-420-2001 | Email: mjr@randazza.com

Firm Offices - Las Vegas | Miami | Hartford | Gloucester, Mass.

* Licensed to practice law in Arizona, California, Florida, Massachusetts, and Nevada.

View my research on my Academia page.

marcrandazza.academia.edu

On Jan 22, 2019, at 12:38 PM, Tennyson Fauver <tjf@randazza.com> wrote:

Counsel:

Please see the attached correspondence from Marc Randazza pursuant to L.R. 26.3(c)(1). Please reach out to our office if you have any questions.

Sincerely,

Tennyson J. Fauver* | **Randazza Legal Group, PLLC**

2764 Lake Sahara Drive, Suite 109, Las Vegas, NV 89117

Tel: (702) 420-2001 | Email: tjf@randazza.com

*Not an attorney - Not licensed to practice law.

<2019.1.22 MJR ltr to oc re Meet and Confer.pdf>